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October 6, 2010

Mr. James G. Warwick
Assistant United States Attorney
36 South Charles Street, 4th Floor
Baltimore, MD 21201

Re: United States v. Balraj Naidu
Criminal Docket No.: CCB-08-0091

Dear Mr. Warwick:

The defense hereby provides notice of the following expert witness: Mr.
Bruce E. Fein.

The defense will seek to qualify Mr. Fein as an expert witness on Sri Lanka,
the Tamil Tigers (LTTE), genocide in Sri Lanka, ethnic civil war in Sri Lanka, and
international law. In particular, the defense will elicit testimony from Mr. Fein on the
following subjects:

- a. The origins, history, and existence of the civil war in Sri Lanka between the
Tamil Tigers (LTTE) in the Northeast Province and the Colombo government
of Sri Lanka.
- b. The genocide, destruction of businesses, and systematic discrimination
committed by the Colombo government of Sri Lanka against the Tamil Tigers
(LTTE) population.
- c. The acts of war committed by both parties in the civil war from 1983 through
2008 in Sri Lanka.
- d. The cease-fire agreement negotiated between the Tamil Tigers (LTTE) and
the Colombo government of Sri Lanka.
- e. The existence of an ethnic civil war in Sri Lanka between the Tamil Tigers
(LTTE) and the Colombo government of Sri Lanka.

- f. The existence of a de facto government in the Northeast Province of Sri Lanka with particular geographic boundaries, language, educational system, postal system, relations with other governments, and other factors.
- g. The historical background of Sri Lanka, including the ethnic and political conflicts within its borders.
- h. The difference between acts of terror and war crimes.
- i. The fundamentals of international law, in particular the definition of a state in international law.

Please see attached enclosures for Mr. Fein's Curriculum Vitae as well as the evidentiary basis for his expert testimony.

Sincerely,

_____/s/____

William B. Purpura
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Enclosures

cc: Clerk of Court (By ECF)